

Baker & Hostetler LLP

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*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ADELINE SHERMAN REVOCABLE TRUST,
AS AMENDED; STEPHEN HELFMAN, in his
capacity as Trustee of the Adeline Sherman
Revocable Trust, as Amended; SUSAN
HELFMAN, in her capacity as Trustee of the
Adeline Sherman Revocable Trust, as Amended;
and ADELINE SHERMAN,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04816 (SMB)

**STIPULATION AND ORDER FOR
VOLUNTARY DISMISSAL WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually (“Madoff”), by and through his counsel, Baker & Hostetler LLP, and Aleida Martinez Molina, counsel for Defendant Adeline Sherman (“Defendant”), (collectively, the “Parties”), hereby stipulate and agree to the following:

1. On December 1, 2010, the Trustee filed and served the Complaint against Defendant.
2. On June 24, 2014, counsel for Defendant filed and served a Motion to Dismiss on the Trustee.
3. The Parties have agreed to dismiss Defendant, who is deceased.
4. In accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(ii), and Federal Rule of Civil Procedure 41(a)(1), the Parties hereby stipulate to a dismissal with prejudice of the Trustee’s claims against Defendant in the above-captioned adversary proceeding.
5. Upon the dismissal of Defendant, the caption of this adversary proceeding is hereby amended to delete Defendant, as reflected on Exhibit A to this stipulation.
6. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties of interest.
7. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and

the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Date: July 24, 2014
New York, New York

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona
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Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff*

**WEISS SEROTA HELFMAN
PASTORIZA COLE & BONISKE**

By: /s/ Aleida Martinez Molina
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*Attorneys for Defendants Adeline Sherman
Revocable Trust, as Amended, Stephen
Helfman, Susan Helfman, and Adeline
Sherman*

So Ordered this 25th day of July, 2014

/s/ STUART M. BERNSTEIN
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

“EXHIBIT A”

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